I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10810 is that it would simplify the licensing structure only by disenfranchising some 27.3 % of the current Advanced and Extra license holders, except for preserving the code sub bands for current and future Extras.

He would automatically upgrade 53.9 % of the current licensees to General (now 20.8 % of the total) without further testing and determination of legal qualifications to operate on the newly available frequencies.

He does not address the new testing requirements, especially with respect to content and depth of questions since privileges would cover a much greater range and says nothing of the current Element 1 content.

Therefore, I would not support this RM.

Thank you for reading and considering my view on this Rulemaking.

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